

### REMARKS

Applicants have amended claims 1, 10, 12, 13, 17, 19 and 24, and have cancelled claims 2-19, during prosecution of this patent application. Applicants are not conceding in this patent application that the subject matter encompassed by said amended and cancelled claims are not patentable over the art cited by the Examiner, since the claim amendments and cancellations are only for facilitating expeditious prosecution of this patent application. Applicants respectfully reserve the right to pursue the subject matter encompassed by said amended and cancelled claims, and to pursue other claims, in one or more continuations and/or divisional patent applications.

Claim 24 has been amended to correct a typographical error (i.e., to add a period (.) at the end of claim 24) and is not in response to a rejection of claim 24.

The Examiner rejected claims 1, 20, 21, 23-28 and 30-33 under 35 U.S.C. § 103(a) as allegedly being unpatentable over US 6,507,826 Maners in view of *University of New Hampshire Financial and Administrative Procedures*, ([http://www.finadmin.unh.edu/pol\\_proc/chapter\\_23/pro23\\_051.html](http://www.finadmin.unh.edu/pol_proc/chapter_23/pro23_051.html)); Issued by Computing and Information Services; Issued Date: 01/01/94; retrieved date 9/11/06) hereinafter, *Procedures* in further view of Furphy et al. (hereinafter *Furphy*, US Patent No. 6,882,983).

The Examiner rejected claims 22 and 29 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Maners, *Procedures*, and *Furphy* as applied to claim 21 above, and further in view of Gershenfeld, (Gershenfeld, Nancy. "Client-server: What Is It and Are We There Yet?" Online. Medford: Mar. 1995. Vol. 19, Iss. 2; pg. 60, 5 pages).

Applicants respectfully traverse the § 103 rejections with the following arguments.

**35 U.S.C. § 103(a): Claims 1, 20, 21, 23-28 and 30-33**

The Examiner rejected claims 1, 20, 21, 23-28 and 30-33 under 35 U.S.C. § 103(a) as allegedly being unpatentable over US 6,507,826 Maners in view of *University of New Hampshire Financial and Administrative Procedures*, ([http://www.finadmin.unh.edu/pol\\_proc/chapter\\_23/pro23\\_051.html](http://www.finadmin.unh.edu/pol_proc/chapter_23/pro23_051.html); Issued by Computing and Information Services; Issued Date: 01/01/94; retrieved date 9/11/06) hereinafter, Procedures in further view of Furphy et al. (hereinafter Furphy, US Patent No. 6,882,983).

**Claims 1, 20, 21, and 23-26**

Applicants respectfully contend that claim 1 is not unpatentable over Maners in view of Procedures in further view of Furphy, because Maners in view of Procedures in further view of Furphy does not teach or suggest each and every feature of claim 1.

Applicants note that claim 1 recites the following servers: front end server, application server, and back end server, which are represented in Maners as indicated in Table 1 or Table 2.

Table 1

Claimed Entity	Represented in Maners, FIG. 2 By
front end server	computer system 206
application server	MicroEDI Server 202 (or network server 212 within server 202)
back end server	computer system 210

Table 2

Claimed Entity	Represented in Maners, FIG. 2 By
front end server	computer system 210
application server	MicroEDI Server 202 (or network server 212 within server 202)
back end server	computer system 206

Applicants note that the only servers depicted in Maners, FIG. 2 are the computer system 210, the MicroEDI Server 202 (or network server 212 within server 202), and computer system 206.

Applicants respectfully contend that the server representations in Table 1 and Table 2 are the only server representations from Maners, FIG. 2 that satisfy the claimed feature of: “said back end server coupled to the front end server via the application server”. Therefore, any other alleged server representation from Maners, FIG. 2 does not satisfy the claimed feature of: “said back end server coupled to the front end server via the application server”.

Applicants next demonstrate that the server representations in Table 1 and Table 2 do not satisfy various features of claim 1 alleged by the Examiner to be disclosed by Maners.

A first reason why claim 1 is not unpatentable over Maners in view of Procedures in further view of Furphy in light of Tables 1 and 2 is that Maners does not disclose the feature: “receiving, by a front end server from a requestor, a purchase request ...; sending, by the front end server to the back end server, a requisition comprising requirements relating to the received purchase request ...; generating, by the back end server in response to receiving the requisition sent by the front end server, said purchase order based on the requisition”.

The preceding feature of claim 1 requires that the back end server generate the purchase order based on a requisition received by the back end server from the front end server, wherein the requisition comprises requirements relating to a purchase request received by the front end server from the requestor.

In consideration of Table 1, Maners does not disclose that the computer system 210 generates the purchase order based on a requisition received by the computer system 210 from the computer system 206, wherein the requisition comprises requirements relating to a purchase request received by the computer system 206 from a requestor.

In fact, Maners does not disclose that the computer system 210 generates the purchase request. Furthermore, Maners, col. 4, lines 1-2 discloses that the computer system 210 is at the vendor site and thus would fulfill a purchase order rather than generate a purchase order. Moreover, Maners does not disclose anywhere who generates the purchase order and most certainly does not disclose that the computer system 210 generates the purchase order.

Even if Maners does disclose that the computer system 210 generates the purchase order (which Maners does not do), Maners does not disclose that the purchase order is generated based on a requisition received by the computer system 210 from the computer system 206, wherein the requisition comprises requirements relating to a purchase request received by the computer system 206 from the requestor.

Moreover, Maners does not disclose who the requestor is and thus Maners does not disclose that the purchase request is received by the computer system 206 from the requestor.

In consideration of Table 2, Maners does not disclose that the computer system 206 generates the purchase order based on a requisition received by the computer system 206 from

the computer system 210, wherein the requisition comprises requirements relating to a purchase request received by the computer system 210 from the requestor.

In fact, Maners does not disclose that the computer system 206 generates the purchase request. Although Maners, col. 5, lines 44-46 discloses that the computer system 206 issues out the purchase order, Maners does not disclose that computer system 206 generates the purchase order. Moreover, Maners does not disclose anywhere who generates the purchase order and most certainly does not disclose that the computer system 206 generates the purchase order.

Even if Maners does disclose that the computer system 206 generates the purchase order (which Maners does not do), Maners does not disclose that the purchase order is generated based on a requisition received by the computer system 206 from the computer system 210, wherein the requisition comprises requirements relating to a purchase request received by the computer system 210 from the requestor.

Therefore, Maners in view of Procedures in further view of Furphy does not disclose the preceding feature of claim 1.

A second reason why claim 1 is not unpatentable over Maners in view of Procedures in further view of Furphy is that Maners does not disclose the feature: "said goods having a designation denoting that the goods are receivable which requires a positive confirmation from the requestor to provide authorization to pay for the goods".

Applicants assert that the preceding feature of claim 1 requires that the requestor provides positive confirmation to provide authorization to pay for the goods. However, Maners does not disclose who the requestor is and thus does not disclose that the requestor provides positive

confirmation to provide authorization to pay for the goods.

In fact, Maners discloses that the MicroEDI Server 202 provides positive confirmation to provide authorization to pay for the goods. See Maners, col. 6, lines 52-55 ("When an invoice is in "posted" status, the invoice has been processed by the MicroEDI Server 202 and determined valid and submitted to the company accounts payable computer system 206 for payment processing"). However, Maners does not disclose that the MicroEDI Server 202 is the requestor.

Therefore, Maners in view of Procedures in further view of Furphy does not disclose the preceding feature of claim 1.

A third reason why claim 1 is not unpatentable over Maners in view of Procedures in further view of Furphy in light of Tables 1 and 2 is that Maners does not disclose the feature: "said goods having a designation denoting that the goods are receivable which requires a positive confirmation from the requestor to provide authorization to pay for the goods ..., said designation being stored in the front end server.

Applicants assert that Maners does not disclose that a designation denoting that the goods require the positive confirmation are stored either in the computer system 206 (Table 1) or the computer system 210 (Table 2). In fact, Applicants assert that Maners does even disclose the existence of a designation denoting that the goods require the positive confirmation to provide authorization to pay for the goods.

However, even if it is argued that the "posted" status for an invoice, as disclosed in Maners, col. 6, lines 52-55 is the designation denoting that the goods require the positive confirmation (which Applicants do not agree with), Applicants assert that Maners, col. 6, lines

34-38 discloses that the MicroEDI Server 202 comprises an invoice history table (e.g., the table shown in Maners, FIG. 4) and that Maners, col. 6, lines 52-55 discloses that an invoice having the "posted" status is stored in the invoice history table in the MicroEDI Server 202, and not in the computer system 206 or in the computer system 210.

Therefore, Maners in view of Procedures in further view of Furphy does not disclose the preceding feature of claim 1.

A fourth reason why claim 1 is not unpatentable over Maners in view of Procedures in further view of Furphy in light of Tables 1 and 2 is that Maners does not disclose the feature: "said application server comprising a positive confirmation bridge; ... said positive confirmation bridge marking the invoice to indicate that said positive confirmation is required.

In Table 1 and and Table 2, the application server is the MicroEDI Server 202, and Maners does not disclose that the MicroEDI Server 202 comprises a positive confirmation bridge that marks the invoice to indicate that said positive confirmation is required. Instead, the MicroEDI Server 202 marks the invoice listed in the table shown in Maners, FIG. 4as having "posted" status denoting that the invoice is valid and does not denote that the positive confirmation is required. (See Maners, col. 6, lines 52-55).

Therefore, Maners in view of Procedures in further view of Furphy does not disclose the preceding feature of claim 1.

A fifth reason why claim 1 is not unpatentable over Maners in view of Procedures in further view of Furphy in light of Tables 1 and 2 is that Maners does not disclose the feature: "a

positive confirmation from the requestor to provide authorization to pay for the goods, ... said front end server comprising a positive confirmation application ..., said positive confirmation application providing notice to the requestor that the invoice has been received and that the invoice includes the required positive confirmation”.

Applicants assert that Maners does not disclose that a positive confirmation application in the computer system 206 (Table 1) or in the computer system 210 (Table 2) providing notice to the requestor that the invoice has been received and that the invoice includes the required positive confirmation of authorization to pay for the goods.

Moreover, Maners does not even identify the requestor and thus does not disclose providing notice to the requestor that the invoice has been received and that the invoice includes the required positive confirmation of authorization to pay for the goods.

Therefore, Maners in view of Procedures in further view of Furphy does not disclose the preceding feature of claim 1.

A sixth reason why claim 1 is not unpatentable over Maners in view of Procedures in further view of Furphy in light of Tables 1 and 2 is that Maners does not disclose the feature: “said front end server receiving a response from the requestor for authorizing or rejecting payment for the goods”.

Applicants assert that Maners does not disclose that the computer system 206 (Table 1) or in the computer system 210 (Table 2) receives a response from the requestor for authorizing or rejecting payment for the goods.

In fact, Maners discloses that the MicroEDI Server 202 (and not the requestor) authorizes



or rejects payment for the goods. See Maners, col. 6, lines 34-36 (“the MicroEDI Server 202 authenticates the vendor ID number and password and determines that a user is authorized”) and Maners, col. 6, lines 52-55 (“the invoice has been processed by the MicroEDI Server 202 and determined valid and submitted to the company accounts payable computer system 206 for payment processing”).

Moreover, Maners does not even identify the requestor and thus does not disclose that the requestor authorizes or rejects payment for the goods.

Based on the preceding arguments, Applicants respectfully maintain that claim 1 is not unpatentable over Maners in view of Procedures in further view of Furphy, and that claim 1 is in condition for allowance. Since claims 20, 21 and 23-26 depend from claim 1, Applicants contend that claims 20, 21 and 23-26 are likewise in condition for allowance.

If the Examiner disagrees with the server representations in Tables 1 and 2 and considers other server representation(s) to be better than the server representations in Tables 1 and 2 for rejecting claim 1, then Applicants would be most appreciative if the Examiner would identify whatever server representation(s) the Examiner considers to be most appropriate for rejecting claim 1, so that Applicants could an objective understanding of the Examiner's argument and could accordingly test any such allegedly better server representation(s) against the limitations in claim 1.

Claims 27-28 and 30-33

As to claim 27, the Examiner argues: “**Claim 27** has similar limitations found in claims 1 and 20 in combination, and therefore is rejected by the same art and rationale.”

In response, Applicants rely on Applicants’ arguments *supra* in relation to claim 1 as being applicable to claim 27.

Based on the preceding arguments, Applicants respectfully maintain that claim 27 is not unpatentable over Maners in view of Procedures in further view of Furphy, and that claim 27 is in condition for allowance. Since claims 28 and 30-33 depend from claim 27, Applicants contend that claims 28 and 30-33 are likewise in condition for allowance.

35 U.S.C. § 103(a): Claims 22 and 29

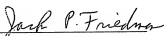
The Examiner rejected claims 22 and 29 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Maners, Procedures, and Furphy as applied to claim 21 above, and further in view of Gershenfeld, (Gershenfeld, Nancy. "Client-server: What Is It and Are We There Yet?" Online. Medford: Mar. 1995. Vol. 19, Iss. 2; pg. 60, 5 pages).

Since claims 22 and 29 respectively depend from claims 1 and 27, which Applicants have argued *supra* to not be unpatentable over Maners in view of Procedures in further view of Furphy under 35 U.S.C. §103(a), Applicants maintain that claims 22 and 29 are likewise not unpatentable over Maners, Procedures, and Furphy, and further in view of Gershenfeld under 35 U.S.C. §103(a).

### CONCLUSION

Based on the preceding arguments, Applicants respectfully believe that all pending claims and the entire application meet the acceptance criteria for allowance and therefore request favorable action. If the Examiner believes that anything further would be helpful to place the application in better condition for allowance, Applicants invites the Examiner to contact Applicants' representative at the telephone number listed below. The Director is hereby authorized to charge and/or credit Deposit Account 09-0457 (IBM).

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